

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

**DEBRA SPERO**, as Natural Mother of  
**V.S.**, an infant,

Plaintiffs,

v.

**VESTAL CENTRAL SCHOOL DISTRICT  
BOARD OF EDUCATION, VESTAL CENTRAL  
SCHOOL DISTRICT, JEFFREY AHEARN,  
Superintendent of Schools, ALBERT A. PENNA,  
Interim Principal of Vestal High School,  
DEBORAH CADDICK and CLIFFORD KASSON,**  
in their Individual and Official Capacities,

Defendants,

**REPLY AFFIDAVIT OF DR.  
ALBERT PENNA**


Civil Action No. 3:17-cv-00007  
(GTS/DEP)

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF BROOME     )

DR. ALBERT PENNA, being duly sworn, deposes and says:

1. I was formerly employed as the interim high school principal for Vestal Central School District ("District"). I make this affidavit of my own personal knowledge and am fully competent to testify as to all matters herein.

2. On December 8, 2017<sup>6</sup>, I personally handled at least two calls from parents expressing concern over a video posted by V.S. on Snapchat depicting an unidentified female with a handgun, and my secretary received at least four more such calls. These calls are in addition to any calls received from parents by School Resource Officer Conor Talbut and the call received by the District from V.S.'s father that day.

  
DR. ALBERT PENNA

Sworn to before me this 11  
day of December, 2017.

  
Notary public

DONNA J. HARRINGTON  
Notary Public, State of New York  
No. 01146018733  
Qualified in Broome County  
Commission Expires January 19, 20 19